

**UNITED STATES BANKRUPTCY COURT FOR  
THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

In re:	§	Case No. 13-52576-cag
	§	
Leroy Ramirez	§	Chapter 13
Erika Ramirez	§	
	§	
DEBTOR	§	Judge: Craig A. Gargotta

**DEBTORS' MOTION FOR AN ORDER EXTENDING THE TIME TO FILE  
DEBTORS' CHAPTER 13 PLAN, SCHEDULES AND STATEMENTS.**

The Debtors, Leroy Ramirez and Erika Ramirez, by and through counsel, hereby request an Order extending the time to file Debtors' Chapter 13 Plan, schedules, statements, pay advices and tax returns pursuant to 11 U.S.C. § 1321, Federal Bankruptcy Rule 1007(c), Rule 3015(b) and Rule 9006(b)(1). The reasons for this Motion are more fully set forth in the enclosed memorandum.

Date: October 9, 2013

Respectfully submitted,

/s/ Joris Robert Vanhemelrijck  
Joris Robert Vanhemelrijck (24056468)  
Attorney for Debtors  
*VANHEMELRIJCK LAW OFFICES, LP.*  
1100 N.W. Loop 410, Suite 215  
San Antonio, TX 78213  
Ph: (210) 804-1529  
Fax: (866) 830-3521  
joris@vanlaws.com

**MEMORANDUM IN SUPPORT**

On September 25, 2013, Debtors, through undersigned counsel, filed Debtors' emergency Chapter 13 petition in this Court, commencing the present case, Case 13-52576-cag , Pursuant to 11 U.S.C. § 1321, Federal Bankruptcy Rule 1007(c), Rule

3015(b) and Rule 9006(b)(1); Debtors had fourteen (14) days to timely file Debtor's Chapter 13 Plan, Schedules and Statements, or to file a motion requesting an order extending said fourteen (14) day time limit.

Debtors have been diligently attempting to collect all documents and information required for accurately completing Debtors' Chapter 13 plan, schedules, statements, pay advices and tax returns. Nevertheless, for reasons outside Debtors' control, Debtors will need some additional time to accurately complete and/or draft Debtors' plan, schedules and statements and acquire pay advices.

Allowing Debtors the additional time necessary to file Debtors' Chapter 13 plan, schedules, statements, pay advices and tax returns will not unduly prejudice any of Debtors' creditors and will avoid Debtors incurring the substantial hardship and duplicative administrative expenses that would ensue if Debtors had to re-file if Debtors' case were dismissed.

WHEREFORE, Debtors pray that pursuant to Federal Bankruptcy Rules 1007(c), 3015(b) and 9006 (b)(1), this Court will enter an order extending the time to file Chapter 13 plan, schedules, statements, pay advices and tax returns until October 23, 2013, and for any other relief that the Court shall deem appropriate.

Date: October 9, 2013.

/s/ Joris Robert Vanhemelrijck  
Joris Robert Vanhemelrijck (24056468)  
Attorney for Debtors  
*VANHEMELRIJCK LAW OFFICES, LP.*  
1100 N.W. Loop 410, Suite 215  
San Antonio, TX 78213  
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**NOTICE AND CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing attached motion was served this date via regular US mail and/or electronically as permitted by the Local Bankruptcy Rules on the parties whose names and full addresses are listed below and for NOTICE that the attached motion has been filed.

Date: October 9, 2013

/s/ Joris Robert Vanhemelrijck  
Joris Robert Vanhemelrijck (24056468)  
Attorney for Debtors  
*VANHEMELRIJCK LAW OFFICES, LP.*  
1100 N.W. Loop 410, Suite 215  
San Antonio, TX 78213  
Ph: (210) 804-1529  
Fax: (866) 830-3521  
joris@vanlaws.com

MARY K VIEGELAHN  
SAN ANTONIO CHAPTER 13 TRUSTEE  
909 NE LOOP 410, SUITE 400  
SAN ANTONIO, TX 78209

UNITED STATES TRUSTEE – SA12  
US TRUSTEE'S OFFICE  
615 E HOUSTON, STE 533  
PO BOX 1539  
SAN ANTONIO, TX 78295-1539

***Debtor***

Leroy and Erika Ramirez  
7839 Horse Hollow  
San Antonio, TX 78244